



Office of Legal Counsel

Office of the
Assistant Attorney General

Washington, D.C. 20530

May 8, 1991

MEMORANDUM FOR JEANNE ARCHIBALD
TERRY O'DONNELL
ALAN RAUL
EDWIN WILLIAMSON
WENDELL WILLKIE

FROM: MIKE LUTTIG *ML*

SUBJECT: Draft Letter to Sam Geldenson

Attached is the draft response that we agreed OLC would prepare.
Nick Rostow has reviewed and signed off on the response. Let me
know if you have any questions.

5/8/91
WLLW

FYE
lin

cc Tom Stillman

*In our
conversation,
please prepare
DOC response.*

*ASAP -
BXA to sign?*

*Th-ba
lin*

Honorable Sam Gejdenson
Chairman
Subcommittee on International
Economic Policy and Trade
Committee on Foreign Affairs
House of Representatives
Washington, D.C. 20515

Dear Mr. Chairman:

April 19,

to Secretary, Moskva, Inc.

Export licensing activities
and policy
relating to

I am writing in response to your letter requesting documents concerning ~~exports to Iraq or sensitive equipment and technology~~

I understand that similar letters have been sent to the Departments of ^{State and Defense.} ~~(State and Defense)~~. Your letters have requested a wide range of intra-agency and inter-agency documents for a twelve-year period from 1979 until the present. Compliance with your request will require this agency to divert its attention from current business to review tens of thousands of

documents, which will require more than a thousand man-hours.

The review will be particularly time-consuming because of the ~~national security nature of many of the documents~~. ^{have been sent to archive or stored on microfilm.} ~~(Modify the preceding two sentences as necessary to make agency specific)~~

~~comments on burden~~ It will also be necessary to coordinate our response with other agencies. [I fear that your request, along with several other pending Congressional demand requests, will adversely affect our ability to process export license

In an effort to accommodate the Subcommittee's legislative interests in this matter, we are proceeding expeditiously to

applications in a timely manner and to complete our work on the Core List and the Enhanced Proliferation Control Initiative.]

Such matters as

as much as
[including license processing and work on the Core List and the Enhanced Proliferation Control Initiative]

collect and review the documents that are responsive to your request. In light of the volume and numerous locations of these materials, however, we will be unable to respond by May 13th, the date requested in your letters. Although we intend to respond as soon thereafter as possible, we believe it would be in the

2 group
representing

interests of all concerned if staff from the Subcommittee and the agencies you have contacted could meet in the near future to discuss how the agencies can best allocate their limited

attempt
to

resources in responding to your requests. At such a meeting we could identify the categories of documents the Subcommittee is most interested in reviewing and discuss ways in which your requests might be narrowed, or otherwise modified, or otherwise satisfied.

If you agree that such a meeting would be useful, please have a member of your staff call ~~(name and number)~~ to make the necessary arrangements.

Mark Neuman,
Director of Congressional
Affairs for Export
Administration,

Sincerely,

Joan M. The Elder
Acting Under Secretary

cc: [State
Defense]